STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF CELLCO PARTNERSHIP

:

DOCKET NO. 448

D/B/A VERIZON WIRELESS FOR A
CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED FOR
THE CONSTRUCTION, MAINTENANCE
AND OPERATION OF A WIRELESS
TELECOMMUNICATIONS FACILITY AT

831 DERBY MILFORD ROAD, ORANGE,

CONNECTICUT

AUGUST 5, 2014

RESPONSES OF CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS TO INTERVENORS' PRE-HEARING INTERROGATORIES AND REQUESTS FOR PRODUCTION

On July 29, 2014, the Intervenors issued Pre-Hearing Interrogatories and Requests for Production to Cellco Partnership d/b/a Verizon Wireless ("Cellco"), relating to the above-captioned docket. Below are Cellco's responses to Interrogatories 1-24, 28-37, 42-68 and 70-75. The remaining responses will be provided on or before August 8, 2014.

Question No. 1

Please identify by name, position and address, any person answering or assisting in responding to these interrogatories and requests for production on behalf of Cellco Partnership d/b/a Verizon Wireless (hereinafter "Verizon" or "Cellco").

Response

Sandy M. Carter, Regulatory Manager, Verizon Wireless, 99 East River Drive, East Hartford, CT 06108; Jaime Laredo, RF Design Engineer, Verizon Wireless, 99 East River Drive, East Hartford, CT 06108; Jay F. Latorre III, RF Design Engineer, Verizon Wireless, 99 East River Drive, East Hartford, CT 06108; Michael P. Libertine, L.E.P., Director of Siting &

Permitting, All-Points Technology Corp., P.C., 3 Saddlebrook Drive, Killingworth, CT 06419; Dean Gustafson, Senior Wetland Scientist and Professional Soil Scientist, All-Points Technology Corp., P.C., 3 Saddlebrook Drive, Killingworth, CT 06419; Eric Davison, Wildlife Biologist, Davison Environmental 10 Maple Street, Chester, CT 06412; Carlo F. Centore, PE, Centek Engineering, Inc., 63-2 North Branford Road, Branford, CT 06405; and Harry Rocheville, Civil Engineer, Centek Engineering, Inc., 63-2 North Branford Road, Branford, CT 06405.

Question No. 2

Please identify the name, position and address of all persons who participated on behalf of Verizon to identify and/or evaluate the subject property at 831 Derby Milford Road, Orange, CT (hereinafter the "Property") with regard to voice and data radio frequency coverage and capacity (collectively hereinafter "service").

Response

Jaime Laredo, RF Design Engineer and Jay F. Latorre III, RF Design Engineer, Verizon Wireless, 99 East River Drive, East Hartford, CT 06108.

Question No. 3

For any persons who evaluated the Property with regard to service, please describe the work those persons performed and/or any documents/records that those persons produced on behalf of Verizon.

Response

Cellco's RF Design Engineers are responsible for new site design for telecommunications facilities to support Cellco's wireless network including but not limited to analysis of network data, customer usage, the placement of new cell sites and the evaluation of candidate site locations. The RF Design Engineers are also responsible for generation of the RF emissions

calculations provided in Response to Council Pre-Hearing Question No. 12. Documents produced by Cellco's RF Engineers in support of this filing are included in the Application, Interrogatory Responses and Supplemental Submissions in this proceeding.

Question No. 4

Please provide copies of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, as well as any documents or communications in electronic form) which show research, analysis or plans pertaining to voice and data radio frequency coverage and capacity for Docket No. 448.

Response

Documents relied upon for the Orange North facility are provided in the Docket No. 448 Application and in Cellco's August 5, 2014 filings, including the Applicant's Response to the Siting Council's Request for Additional Information.

Ouestion No. 5

Response

Please identify the name, position and address of all persons who participated on behalf of Verizon to evaluate the Property with regard to any potential environmental impact from the proposed cell tower and related facilities at the Property (hereinafter the "proposed facilities").

Michael P. Libertine, L.E.P., Director of Siting & Permitting, All-Points Technology

Corp., P.C. ("APT"), 3 Saddlebrook Drive, Killingworth, CT 06419; Dean Gustafson, Senior Wetland Scientist and Professional Soil Scientist, All-Points Technology Corp., P.C., 3 Saddlebrook Drive, Killingworth, CT 06419; Eric Davison, Wildlife Biologist/Wetland Scientist/Soil Scientist, 10 Maple Street, Chester, CT 06412; Carlo F. Centore, PE, Centek Engineering, Inc., 63-2 North Branford Road, Branford, CT 06405; and Harry Rocheville, Civil

Engineer, Centek Engineering, Inc., 63-2 North Branford Road, Branford, CT 06405.

Question No. 6

For any persons who evaluated the Property with regard to any potential environmental impact from the proposed facilities, please describe the work those persons performed and/or any documents/records that those persons produced on behalf of Verizon.

Response

Michael Libertine and Dean Gustafson with APT were responsible for evaluating the nature of probable environmental impacts of the proposed facility in accordance with the Council's statutory requirements including impacts on the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forests and parks, air and water purity and fish, aquaculture and wildlife. (*See* Conn. Gen .Stat. § 16-50p). Eric Davison, Wetland Biologist, was responsible for evaluation of the facility's potential impacts on vernal pool and upland habitat. Carlo F. Centore and Harry Rocheville were responsible for the cell site civil engineering and evaluated construction impacts associated with the proposed tower and access driveway.

Question No. 7

Please provide copies of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, as well as any documents or communications in electronic form) which show the potential environmental impact of the proposed facilities.

Response

All reports, documents, records and communications related to the evaluation of potential environmental impacts have been filed with the Council in this proceeding, including the

Application, Interrogatory Responses, Supplemental Submissions and related information.

Question No. 8

Please identify the name, position and address of all persons who participated on behalf of Verizon to evaluate the proposed facilities with regard to compliance with any local, state or federal regulations.

Response

Alexandria M. Carter, Regulatory Manager, Verizon Wireless, 99 East River Drive, East Hartford, CT 06108; Michael P. Libertine, L.E.P., Director of Siting & Permitting, All-Points Technology Corp., P.C.; Rachel A. Mayo, Land Use Analyst, Robinson & Cole LLP, 280 Trumbull Street, Hartford, CT 06103; and Jaime Laredo, RF Design Engineer, Verizon Wireless, 99 East River Drive, East Hartford, CT 06108.

Ouestion No. 9

For any persons who evaluated the proposed facilities with regard to compliance with any local, state or federal regulations, please describe the work those persons performed and/or any documents/records that those persons produced on behalf of Verizon.

Response

The evaluation of federal, state and local requirements relevant to the Docket No. 448 application is summarized in the Application narrative, Section III.D. 3 and 4 and includes compliance with National Environmental Policy Act (NEPA) requirements and Federal RF emissions standards, State environmental reviews and a review of local land use ordinances. Documents and/or records produced during this review have been filed with the Council in this proceeding and are included in the Application, Interrogatory Responses and Supplemental Submissions.

Question No. 10

Please provide copies of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, as well as any documents or communications in electronic form) which demonstrate compliance or non-compliance of the proposed facilities with any local, state or federal regulations.

Response

All reports, documents, records and communications related to the evaluation of compliance with local, state and federal requirements related to the proposed Orange North facility have been filed with the Council in this proceeding, and are included in the Application, Interrogatory Responses and Supplemental Submissions.

Ouestion No. 11

State the names, addresses and titles of all experts who you intend to use as expert witnesses in support of this Docket No. 448.

Response

Cellco's witness panel will consist of the individual listed in the Applicant's response to Q. 1 above.

Question No. 12

For each witness identified in response to the preceding interrogatory, state:

- (a) the qualifications of each expert witness;
- (b) the subject matter on which each expert witness is expected to testify;
- (c) the substance of the facts and opinions on which each expert witness is expected to testify; and

(d) a summary of the grounds for each opinion of each expert witness expected to testify.

Response

Michael Libertine, Dean Gustafson and Eric Davison will address all matters related to the potential environmental effects associated with the proposed Orange North facility. Jamie Laredo and Jay Latorre will address all RF design issues associated with the proposed Orange North facility. Carlo Centore and Harry Rocheville from Centek Engineers will address all site development and construction issues related to the proposed Orange North facility. (Please note that due to a scheduling conflict, Mr. Centore will not be available at the August 12, 2014 hearing, but will return for the September 16, 2014 hearing session). Sandy Carter will address general siting matters for Cellco facilities and specific siting matters related to the Orange North facility. Each of these witnesses has been responsible for compilation of those portions of the Application, interrogatory responses and supplemental submissions within their particular areas of expertise.

Question No. 13

Please provide resume or curriculum vitae of any expert witness whom Verizon intends to use to support its application for Docket No. 448.

Response

See Attachment 1.

Question No. 14

State the names, address and titles of any fact witnesses you intend to call to testify in support of this Docket No. 448.

Response

See Response to Q. 12.

Question No. 15

Within the last three (3) years, did Verizon communicate with any staff or officials from the Town of Orange (hereinafter "Orange" or "the Town") with regard to the Property or any alternative locations for Verizon's coverage needs associated with Docket No. 448?

Response

Yes. The summary of Cellco's consultation with Town officials is provided in Section III.D.5. of the Application narrative.

Question No. 16

If any part of your response to the preceding interrogatory is in the affirmative, state:

- (a) the name(s) and position(s) of the any Orange official(s) or employee(s);
- (b) to the best of your recollection, the date(s) (and or approximate date(s)) during which the communication(s) took place; and
- (c) to the best of your recollection, what issues were discussed?

Response

See Response to Q. 15.

Question No. 17

Please provide copies of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, as well as any documents or communications in electronic form) in which Verizon, or any of its representatives, communicated with any Orange officials or employees pertaining to the Property or any

alternative locations for Verizon's coverage needs associated with Docket No. 448.

Response

A copy of Cellco's "Technical Report" referenced in Section III.D.5. of the Application narrative was filed with the Council and is identified as Applicant's Exh. 1.d. In addition, included in Attachment 2 are three emails between Cellco's Counsel and Town officials following up on certain issues discussed at the February 18, 2014 Planning and Zoning Commission meeting. These issues included Cellco's consideration of the town-owned Turkey Hill Preserve property as a possible alternative to 831 Derby Milford Road, a response from Town Selectman Mitch Goldblatt and notification to town officials of a balloon float scheduled for March 5, 2014.

Question No. 18

Referencing the map in Attachment 6 — Coverage Maps, entitled Existing Verizon

Wireless 700 MHz coverage without Proposed Orange North Facility Antenna Centerline at 100

Feet AGL, as a basis, please identify by highlight or outline the "series of coverage gaps" at 700

MHz "in the central Orange area" that the proposed facility "will provide reliable wireless service to".

Response

The locations of coverage gaps in central Orange, southeast Derby, and eastern Shelton, as described in the Application, are depicted on Cellco's 700 MHz and 2100 MHz coverage plots. These gaps are outlined in red on the coverage maps included in Attachment 3. Similar gaps at Cellco's 850 MHz and 1900 MHz frequencies are outlined in red on coverage maps included in Attachment 4.

Question No. 19

Referencing the map in <u>Attachment 6 – Coverage Maps</u>, entitled *Existing Verizon Wireless* 700 MHz coverage without Proposed Orange North Facility Antenna Centerline at 100 Feet AGL, as a basis, please identify by highlight or outline the "series of coverage gaps" at 700 MHz "in the portions of southeast Derby" that the proposed facility "will provide reliable wireless service to".

Response

See Cellco's response to Q. 18.

Question No. 20

Referencing the map in <u>Attachment 6 – Coverage Maps</u>, entitled *Existing Verizon Wireless* 700 MHz coverage without Proposed Orange North Facility Antenna Centerline at 100 Feet AGL, as a basis, please identify by highlight or outline the "series of coverage gaps" at 700 MHz "in eastern Shelton" that the proposed facility "will provide reliable wireless service to".

Response

See Cellco's response to Q. 18.

Question No. 21

What is the land area of the "series of coverage gaps" at 700 MHz identified in the Interrogatories 18 to 20 that the proposed facility will provide reliable wireless service to?

Response

The total land area of the series of coverage gaps referenced in the Application is 1.19 square miles at 700 MHz and 2.07 square miles at 2100 MHz.

Question No. 22

Referencing the map in Attachment 6 - Coverage Maps. entitled Existing Verizon Wireless

700 MHz coverage with Proposed Orange North Facility Antenna Centerline at 100 Feel AGL: as a basis, what is the total land area to which the proposed facility would provide 700 MHz coverage?

Response

The coverage footprint for Cellco's wireless service depicted in the purple color on the coverage maps in Attachment 6 of the Application is 12.74 square miles at 700 MHz and 5.06 square miles at 2100 MHz.

Question No. 23

What is the name(s), address(s), affiliation(s) and credentials of the individual(s) who prepared the coverage maps in <u>Attachment 6?</u>

Response

Jaime Laredo and Jay Latorre, Cellco's RF Engineers were responsible for preparing the Applicant's coverage maps. Mr. Laredo's and Mr. Latorre's resumes are included in <u>Attachment 1</u> of these Responses.

Question No. 24

Please provide the curriculum vitae or resume of any individuals who prepared the coverage maps in Attachment 6.

Response

See Response to Q. 23.

Question No. 28

How do the coverage plots included in <u>Attachment 6</u> demonstrate that the "Orange North Facility will also provide significant capacity relief to Cellco's existing Milford NE... cell sites"? Response

The coverage maps included in <u>Attachment 6</u> of the Application generally do not demonstrate the need for capacity relief from any of the surrounding facilities. Coverage plots typically depict "coverage" from the adjacent cell sites and "coverage" anticipated from the proposed Orange North cell site. The only benefit the coverage maps provide when addressing the issue of "capacity relief" relates to the area where coverage from the Orange North facility overlaps with coverage from the surrounding sites. It is in this area that customers will realize the "capacity relief" or "traffic off-loading" that Cellco anticipates achieving from the Orange North facility.

Question No. 29

How do the coverage plots included in <u>Attachment 6</u> demonstrate that the "Orange North Facility will also provide significant capacity relief to Cellco's existing... Shelton 2... cell sites"? Response

See Response to Q. 28.

Question No. 30

How do the coverage plots included in <u>Attachment 6</u> demonstrate that the "Orange North Facility will also provide significant capacity relief to Cellco's existing... Derby... cell sites"?

Response

See Response to Q. 28.

[No Q. 31 provided].

Question No. 32

How do the coverage plots included in Attachment 6 demonstrate that the "Orange North

Facility will also provide significant capacity relief to Cellco's existing... Derby North... cell sites"?

Response

See Response to Q. 28.

Question No. 33

How do the coverage plots included in <u>Attachment 6</u> demonstrate that the "Orange North Facility will also provide significant capacity relief to Cellco's existing Orange 2... cell sites"?

Response

See Response to Q. 28.

Question No. 34

How do the coverage plots included in <u>Attachment 6</u> demonstrate that the "Orange North Facility will also provide significant capacity relief to Cellco's existing... Orange 3 cell sites"?

Response

See Response to Q. 28.

Question No. 35

Were the capacity determinations made by Verizon as part of this Docket No. 448 measured in "dBm"?

Response

No. The dBm value is a measure of signal receipt strength and relates to coverage, not capacity.

Question No. 36

What is the metric (or metrics) that Verizon uses to assess capacity needs with respect to its 700 MHz and 2100 MHz facilities?

Response

See Applicant's Exhibit No. 4 and Response to Council's Request for Supplemental Information dated August 5, 2014.

Question No. 37

Based on the 700 MHz and 2100 MHz metrics referenced in interrogatory 29, how did

Cellco determine that the relevant sectors of the existing facilities are "reaching or [are] forecast to reach their respective capacity limits by 2016"?

Response

See Applicant's Exhibit No. 4 and Response to Council's Request for Supplemental Information dated August 5, 2014.

Question No. 42

What is the means by which the 700 MHz and 2100 MHz systems at the Property will be connected to the "Mobile telephone switching offices ("MTSOs") in Windsor and Wallingford" when the system is turned on?

Response

Cellco anticipates that the Orange North facility will connect to its mobile telephone switching offices (a/k/a "backhaul") by fiber optic cable.

Question No. 43

If the proposed facilities are constructed to the proposed height and "designed to be extended up to 20 feet" as proposed, and assuming the current regulatory (federal, state and local) scheme is in place at the time of a proposed height extension, what permits or regulatory review would be required for Verizon to extend the height of the tower up to 20 feet to install antennas belonging to Verizon and/or any co-locators at the higher positions on the extended tower?

Response

The Siting Council regularly asks applicants to design and construct new towers and foundations so that the tower could be extended in the future if other wireless carriers wish to do so. Cellco has no plans to extend the existing tower beyond the height of 100 feet as proposed in the Docket No. 448 Application. Typically, if another carrier proposes to extend the tower, the request would be presented to the Council for approval of a Petition for Declaratory Ruling or Certificate Modification.

Question No. 44

If this Docket No. 448 application is approved by the Connecticut Siting Council (hereinafter "CSC"), pursuant to Section 6409 of the Middle Class Tax Relief and Jobs Creation Act of 2012 (AKA 47 U.S.C. § 1455(a)), and the proposed facility is constructed, would the owner of the constructed facility need to obtain approval from the CSC, or any other state or local board or agency, in order to make any modifications to the proposed facility which do not "substantially change" the physical dimensions of the proposed facility?

Response

Any modifications to a facility under the Council's jurisdiction would require further Council approvals before those modifications could be made.

Question No. 45

If you responded in the affirmative (i.e., "yes") to the preceding interrogatory, what approvals would a Cellco or any future owner of the proposed facilities need to obtain in order to make any modifications to the proposed facilities which do not "substantially change" the physical dimensions of the proposed facilities?

Response

Depending upon the type of modifications proposed, Council approval or acknowledgement of the proposed modification would be required in accordance with the Regulations of Connecticut State Agencies. (e.g. Acknowledgement of Exempt Modifications; Petition for Declaratory Ruling; Modification of the existing Certificate).

Question No. 46

If you responded in the negative (i.e., "no") to the interrogatory 44, why do you believe that Cellco or any future owner of the proposed facilities would not need to obtain any approvals from any state or local board or agency in order to make any modifications to the proposed facilities which do not "substantially change" the physical dimensions of the proposed facilities? Response

No response required.

Question No. 47

If either CSC approval and/or local zoning approval are not among the approvals required as reported in interrogatory 44, please explain why.

Response

No response required.

Question No. 48

Pursuant to Section 6409 of the Middle Class Tax Relief and Jobs Creation Act of 2012 (AKA 47 U.S.C. § 1455(a)), would Verizon consider a ten (10) foot extension of the height of the tower at the proposed facilities a "substantial change" to the physical dimensions? If not, why?

Response

The applicant objects as the question seeks a legal opinion not appropriately addressed by

anyone on Cellco's witness panel.

Question No. 49

Pursuant to Section 6409 of the Middle Class Tax Relief and Jobs Creation Act of 2012 (AKA 47 U.S.C. § 1455(a)), would Verizon consider a fifteen (15) foot extension of the height of the tower at the proposed facilities a "substantial change" to the physical dimensions? If not, why?

Response

The applicant objects as the question seeks a legal opinion not appropriately addressed by anyone on Cellco's witness panel.

Question No. 50

Pursuant to Section 6409 of the Middle Class Tax Relief and Jobs Creation Act of 2012 (AKA 47 U.S.C. § 1455(a)), would Verizon consider a twenty (20) foot extension of the height of the tower at the proposed facilities a "substantial change" to the physical dimensions? If not, why?

Response

The applicant objects as the question seeks a legal opinion not appropriately addressed by anyone on Cellco's witness panel.

Question No. 51

Pursuant to Section 6409 of the Middle Class Tax Relief and Jobs Creation Act of 2012 (AKA 47 U.S.C. § 1455(a)), would Verizon consider a twenty five (25) foot extension of the height of the tower at the proposed facilities a "substantial change" to the physical dimensions? If not, why?

Response

The applicant objects as the question seeks a legal opinion not appropriately addressed by anyone on Cellco's witness panel.

Question No. 52

Pursuant to Section 6409 of the Middle Class Tax Relief and Jobs Creation Act of 2012 (AKA 47 U.S.C. § 1455(a)), would Verizon consider a thirty (30) foot extension of the height of the tower at the proposed facilities a "substantial change" to the physical dimensions? If not, why?

Response

The applicant objects as the question seeks a legal opinion not appropriately addressed by anyone on Cellco's witness panel.

Question No. 53

With respect to the consideration of "capacity relief", what is the basis for the proposed antenna height of 103 feet AGL?

Response

Cellco's RF engineers have determined that antennas at a centerline height of 100 feet (103 feet to the top of the proposed antennas) would be the minimum necessary in order for Cellco to provide the capacity relief required. The 100-foot antenna centerline height allows for adequate clearance of existing trees and topography needed to connect to the adjacent cell sites.

Question No. 54

Is it possible to obtain the necessary "capacity relief" with an antenna height that is lower than 103 feet AGL? If so, what is the lowest possible antenna height that Verizon could use in order to obtain the necessary "capacity relief", and why?

Response

No. See Cellco's Response to Q. 53.

Question No. 55

Do proposed facilities comply with the Orange zoning regulations? If not, please specify those provisions which the proposed facilities do not comply and the manner in which the proposed facilities do not comply.

Response

The proposed facility is under the Council's exclusive jurisdiction which preempts local zoning authority. That said, as discussed in Section III.D.4. of the Application and further discussed during the evidentiary proceeding on July 17, 2014, the proposed facility will comply with all tower setback requirements in the Orange Zoning Regulations with the exception of the 200-foot property line setback. The tower is currently proposed to be located 145 feet from the nearest property to the west, owned by the OR Shalom/B.J.S.G. Cemetery Association.

Question No. 56

Do proposed facilities comply with the Orange inland-wetlands regulations? If not, please specify those provisions which the proposed facilities do not comply and the manner in which the proposed facilities do not comply.

Response

The proposed Orange North facility is under the Council's exclusive jurisdiction which preempts local wetlands authority. A summary of local wetland requirements is provided in Section III.D.4.d. of the Application narrative.

Question No. 57

Did Verizon consider the use of "small cells" (including but not limited distributed antenna systems, micro-cells, and pico-cells) as an alternative to the proposed facilities? If so, in

what manner did Verizon consider the use of "small cells"? If not, why did Verizon not consider the use of "small cells" as an alternative to the proposed facilities?

Response

No. The use of a small cell in this area would not provide the same wireless service benefits (coverage and capacity relief) provided by the Orange North macro-cell. The typical small cell, with antennas at a height of 30 to 40 feet above ground level offers a coverage footprint of only several hundred feet radius. As referenced in Response to Q. 22 above, the coverage footprint for the Orange North cell site is 12.74 square miles at 700 MHz and 5.06 square miles at 2100 MHz.

Question No. 58

Please provide copies of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, as well as any documents or communications in electronic form) which demonstrate any research or analysis that Verizon conducted with regard to the use of "small cells" as an alternative to the proposed facilities.

Response

No documents or reports were prepared to complete this analysis.

Question No. 59

What were the specific reasons why the property owners of 814 Glenbrook Road, Orange, CT were not interested in leasing space to Verizon?

Response

When contacted, the owners of the property at 814 Glenbrook Road said they were not interested in leasing space to Cellco for a tower site. No further explanation was offered.

Question No. 60

Please provide copies of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, as well as any documents or communications in electronic form) pertaining to Verizon trying to lease space at 814 Glenbrook Road, Orange, CT and Verizon's evaluation of 814 Glenbrook Road, Orange, CT.

Response

No such documents exist. The property owner at 814 Glenbrook Road was contacted by telephone.

Question No. 61

What were the specific reasons why the property owners of 870 Garden Road, Orange, CT were not interested in leasing space to Verizon?

Response

When contacted, the owners of the property at 814 Glenbrook Road said they were not interested in leasing space to Cellco for a tower site. No further explanation was offered.

Question No. 62

Please provide copies of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, as well as any documents or communications in electronic form) pertaining to Verizon trying to lease space at 870 Garden Road, Orange, CT and Verizon's evaluation of 870 Garden Road, Orange, CT.

Response

No such documents exist. The property owner at 870 Garden Road was contacted by telephone.

Question No. 63

What were the specific reasons why Verizon determined that the property at 414 Cold

Spring Lane, Orange, CT "did not maintain adequate ground space for the development of a telecommunications facility compound"?

Response

The 414 Cold Spring Lane parcel is representative of a number of lots in the areas to the northeast of the Bespuda Farm. This parcel is in the middle of an established single family area with lots sizes of approximately one acre. There does not appear to be any location in this area where a tower site could be adequately buffered from the surrounding residences.

Question No. 64

Please provide copies of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, as well as any documents or communications in electronic form) pertaining to Verizon's research, analysis, plans or studies of the property at 414 Cold Spring Lane, Orange, CT as a potential alternative location?

Response

No such documents exist.

Ouestion No. 65

What were the specific reasons why Verizon determined that the ground elevation at the property at 1730 Derby Milford Road, Orange, CT "was too low to allow Cellco to satisfy its wireless service objectives in the area?

Response

According to publicly available topographic information, the ground elevation at 1730 Derby Milford Road is 50 feet AMSL, which is 84 feet lower than the ground elevation at the proposed Orange North cell site. This location is also 0.7 miles northwest of the search ring established for the Orange North cell site and would not satisfy Cellco's wireless service

alternative location for Docket No. 448?

Response

The Housatonic Overlook and Tucker's Ridge property was not investigated as an alternative because it is located more than ____ miles south of the Orange North search ring.

According to local land records the parcel is owned by the Town of Orange, is maintained as an open space parcel with hiking trails and used for passive recreation purposes.

Question No. 70

Did Verizon consider the property at 803 Derby Milford Road, Orange, CT as an alternative location (attached hereto as **Exhibit 3** is records pertaining to said property)? If yes, what were the specific reasons why Verizon did not choose said property as the location for Docket No. 448? If no, why did Verizon not consider said property as an alternative location for Docket No. 448?

Response

No. According to the information provided, this is a 1.35 acre residential parcel in an established residential neighborhood. There does not appear to be any location on this parcel where a tower site could be located and adequately buffered from the surrounding residences.

Question No. 71

Does Verizon believe that the property at 803 Derby Milford Road, Orange, CT is a viable alternative location? If not, please explain why?

Response

See Cellco's response to Q. 70.

Question No. 72

At the end of High Ridge Road in Orange, CT is a cul de sac (i.e., public street) at the

entrance to the Housatonic Overlook and Tucker's Ridge property (a picture of this location is attached hereto as **Exhibit 4**). Did Verizon consider placing a small cell or any type on a utility pole on or near said location?

Response

No.

Question No. 73

Does Verizon believe that the property described in interrogatory No. 72 is a viable alternative location? If not, please explain why?

Response

A small cell or utility pole type installation (typically 30' to 40' in height) at the end of High Ridge Road would provide coverage to a very limited area around the small cell or pole location (approximately several hundred feet radius) and would not satisfy the wireless service objectives in Cellco's Orange North search area.

Question No. 74

Did Verizon consider any locations for utility pole installations (existing or new poles) for the placement of the proposed facilities? If yes, please explain any such considerations. If not, please explain why Verizon did not consider any locations for utility pole installations for the placement of the proposed facilities?

Response

No. Cellco cannot satisfy its wireless service objectives in the Orange North search area using utility pole installations. Such facilities have very limited coverage footprints, are often located in the public rights of way, do not typically provided coverage beyond the limits of the rights of way and are not capable of providing the capacity relief that Cellco can achieve from the

proposed Orange North facility.

Question No. 75

Please provide a copy of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, including electronic) which you relied upon or referenced in order to respond to any of these interrogatories.

Response

No response required.

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of August, 2014, a copy of the foregoing was sent via electronic and first class mail, postage prepaid, to the following:

Albert Subbloie c/o Mario F. Coppola, Esq. Mark Kovack, Esq. Berchem, Moses and Devlin, P.C. 1221 Post Road East Westport, CT 06880 mcoppola@bmdlaw.com mkovack@bmdlaw.com	Jacqueline Barbara c/o Mario F. Coppola, Esq. Mark Kovack, Esq. Berchem, Moses and Devlin, P.C. 1221 Post Road East Westport, CT 06880 mcoppola@bmdlaw.com mkovack@bmdlaw.com
Glenn Macinnes c/o Mario F. Coppola, Esq. Mark Kovack, Esq. Berchem, Moses and Devlin, P.C. 1221 Post Road East Westport, CT 06880 mcoppola@bmdlaw.com mkovack@bmdlaw.com	Jill Macinnes c/o Mario F. Coppola, Esq. Mark Kovack, Esq. Berchem, Moses and Devlin, P.C. 1221 Post Road East Westport, CT 06880 mcoppola@bmdlaw.com mkovack@bmdlaw.com
State Senator Gayle Slossberg Legislative Office Building Room 2000 Hartford, CT 06106 gslossberg@yahoo.com	State Representative Paul Davis Legislative Office Building Room 4045 Hartford, CT 06106 paul.davis@cga.ct.gov
State Representative Themis Klarides Legislative Office Building Room 4200 Hartford, CT 06106 themis.klarides@housegop.ct.gov	State Representative James Maroney Legislative Office Building Room 5006 Hartford, CT 06106 james.maroney@cga.ct.gov

Kenneth C. Baldwin

ATTACHMENT 1

Sandy Carter, Regulatory Manager Verizon Wireless

For the last 20 years Sandy Carter has been a Regulatory Manager for Verizon Wireless responsible for the permitting of cell sites in Connecticut, Vermont and Western Massachusetts. Ms. Carter has over 35 years of experience in the public and private sector related to site and project planning, development and permitting and, over the last 20 years, was responsible for all aspects of permitting for hundreds of wireless telecommunications facilities throughout the New England West territory. Ms. Carter holds a Bachelor's Degree from Quinnipiac University, a Master's Degree in Public Administration from the University of New Haven and a Master's of Science Degree from Southern Connecticut State University. She has served on the Planning & Zoning Commission in the Town of North Haven and was North Haven's Town Planner and Zoning Enforcement Officer. She also served as a member of the Board of Selectmen in North Haven for 2 years. She served as a member and past president of the North Haven Rotary Club and is currently a member of the Durham Middlefield Exchange Club.

JAIME L. LAREDO JR.

59 Fenwick Dr, Farmington, CT 06032 | (860)308-4534 | jaime.laredo@verizonwireless.com

RF DESIGN ENGINEER

Results-driven and well-organized Technical Professional who combines solid hands-on experience with excellent educational achievement. Strong skills in RF design & optimization and network pre & post-launch tuning & optimization.

KEY COMPETENCIES

Senior RF Engineer with 10 years of network design and optimization with multi-technology and multi-vendor experience.

- Senior RF Design and Optimization Engineer for LTE, GSM/UMTS, and CDMA/EVDO Networks
- Pre-Launch Tuning and Post-launch Optimization for NSB, SSV, additional UMTS carriers, and new LTE eNB's
- Strong knowledge of Ericsson, Nokia, and Alcatel-Lucent equipment
- Develops tools. Strong knowledge of MS Excel with Visual Basic Programming.

WORK EXPERIENCE

Verizon New England West Market, RF Engineer III, Oct 2013 to Present

- Design new build sites, carrier adds, antenna modifications, and site relocations
- Propose solutions for network capacity exhaust and performance issues
- Verify new site locations and provide document support for regulatory applications

AT&T Louisiana Market, Sr. RAN Optimization Engineer, Celcite Management Solutions LLC, May 2012 to Sept 2013

- Solve network performance issues related to voice and data retainability, accessibility, mobility, integrity, time not on LTE (TNOL), 3G device calling on 2G (3Gon2G), coverage, and quality distribution (QD) offenders in order to achieve the market composite quality index (CQI) target
- Conduct parameter audits for all technologies (LTE/UMTS/GSM) and align the setting according to the latest Gold Standard (GS) and Field Guide Alerts (FGA). Latest parameter dumps were extracted using Common Explorer, ERAN, CM Operations Manager, and COPS.
- Develop tools using Microsoft Visual Basic for urgent and important tasks that consume more time to accomplish
- Evaluate EutranCellFDD cell designations if set correctly and align the SIB6 & SIB19 parameters according to the designed LTE layer management (LM) strategy
- Identify missing Eutran/Utran frequency relation and frequency mismatch according to the frequency license acquired per county
- Locate external interference sources which degrades the data throughput using network RSSI statistics through AMOS, Quantum, and field scan result using R&S PR100 Portable Receiver
- Evaluate Utrancell designations if set correctly and eliminate aggressive compress mode triggers or non-used 2d threshold according to UMTS layer management (LM) strategy
- Evaluate sites with capacity issue and implement parameter or HW changes to balance the traffic among carriers and neighbors cells or add more capacity if needed
- Ensure all important neighbor relations are defined correctly according to its geographical location, layer management (LM) strategy, load sharing strategy, and IFHO round robin strategy especially in carrier border and market border locations
- Propose solutions for performance degradations caused by new network elements like new site builds (NSBs),
 SSVs, and cluster launches

- Conduct field visits to optimize poor coverage areas, control over-propagating servers, analyze exceptional
 drop call or call failure cases (using TEMS Investigation), solve passive intermodulation (PIM) issues (using
 Summitek PIM Test Equipment), locate external interference sources (using R&S PR100 Portable Receiver)
- Prompt escalation of major and critical network errors to the responsible group in order to immediately restore the network back to its normal operation
- Detect network performance degradations and generate statistical reports using Quantum, Business Objects, and COPS
- Provide support for special events

AT&T North California 4th Carrier Pre and Post Launch Optimization Project, RF Service Engineer, Ericsson US, April to December 2011

- RBS parameter and neighbor audit
- HW fault and swapped antenna feeder detection
- Drive test analysis and initial tuning
- Layer management preparation and missing neighbor check
- Close KPI monitoring for site/cluster launches
- Neighbor clean-up
- Layer management optimization
- Worst performing cell analysis and parameter recommendation
- Propagation delay audit, coverage and pilot pollution analysis for severe drop cases due to bad coverage and quality, and provide antenna tilt & azimuth recommendation
- Capacity optimization and traffic balancing among carriers
- Knowledgeable in transport layer and RBS event analysis in solving uncategorized drop events and congestion/accessibility issues
- Knowledgeable in using Schema, RMAP and TEMS Investigation
- Create solutions for uncommon KPI degradations using Schema/GPEH information and generate specific Business Objects reports
- Strong visual basic scripting for network-wide data management
- Special project handled: AT&T JTS Project Support / Layer Management Optimization for Sites Affected by Sparsing in San Francisco, Oakland, Palo Alto, Los Altos, Santa Clara, and San Jose, California

Optimization Project - NPOC, Sr. RF Planning and Optimization Engineer, Ericsson KSA, September 2007 to December 2010

- Responsible for analysis and fine tuning parameters and creating recommendations for UMTS RAN & 2G BSS
- Well experienced in conducting initial tuning procedure for new 2G/UMTS sites, resolving high
 interference/pilot pollution causes, and neighbor cleanup using available statistics and drive test logs (using
 MCOM, Tems Route Analysis and scanner mode drive test)
- Perform RAN/RNC and BSS audit and health check on daily basis
- Optimize neighbor relations and soft/softer/I-RAT handover for UMTS with the use of available statistics and drive test/route analysis
- Provide initial troubleshooting for UMTS networks using trace (Ueh Exception & Error Log) and any available data in OSS in order to accurately identify the cause of problem
- Knowledgeable in resolving congestion cases in order to improve network Quality of Service (QoS)
- Capable of reviewing and recommending the optimum physical setting of both 2G and UMTS sites in order to
 effectively resolve coverage, capacity, and quality issues
- Capable of monitoring disturbances in Core Network (lub, A-bis, Transcoder, PCU, Gb, TRH, etc) that affects accessibility, retainability, integrity, and mobility for both 2G and UMTS network

- Provided support in designing new frequency plan by extracting data from OSS (existing frequency sets & hopping strategy) and generating mobile measurement report data to be processed using Optimi's automatic frequency planning tool (xAFP)
- Network performance optimization support for major/special events in the Kingdom (Ramadan and Hajj)
- Daily monitoring of both 2G and UMTS network performance, attend customer requests (frequency plan, resource dimensioning, new site proposals, resolution of customer complaint cases, support for major network activities, etc.), conduct network feature trials to achieve contracted KPI targets, analyze drivetest results and recommend physical or parameter changes
- Conduct site surveys and nominal plan verification for target coverage objectives
- BSS dimensioning and capacity planning
- Involved in coverage optimization projects to fine tune antenna settings and effectively cover targeted areas especially indoor signal penetration
- Perform hardware and configuration problem isolation and troubleshooting
- Involved in new frequency plan implementations and data recording for miscellaneous result reporting

Telkomsel Optimization Project, Network Performance Improvement Consultant, Ericsson Indonesia, June 2006 – March 2007

- Support for BSS swap-out activities from Motorola to Ericsson
- Attend to customer complaints, daily network KPI monitoring, end-to-end implementation of changes in the
 network (frequency plan preparation and execution, transcoder and A-bis dimensioning, LAC re-bordering,
 etc.), site surveys, conduct drivetest and drivetest analysis, feature trials, conduct short courses for new staffs,
 and present results to upper management

Globe Telecom Philippines, Sr. RF Planning and Optimization Engineer, April 2004 – May 2006

- Plan new site locations, prepare frequency strategy and site physical settings, radio resource dimensioning, conduct site surveys and drivetest, support major network activities (BSC migration, LAC rebordering, etc.), involvement with preparations done for special events, KPI monitoring for new sites, resolve worst performance cases as preparation for site acceptance, site progress reporting, BOQ preparation, propose advanced solutions, and conduct small trainings
- Site verification, review site plan (In-building Solution, Outdoor Sites), initial tuning for cluster with new DAS/IBS deployed, propagation/path loss analysis, and troubleshooting (signal over-spilling, bad quality/signal isolation problem, site configuration problem, high path loss, etc)
- Knowledgeable in analyzing and fixing problems using Ericsson OSS tools (RNO, Alarm Log Browser, R-PMO, CNA, MTR/CTR, OPS, Command Handling with excellent scripting skills, etc)
- Conduct daily monitoring of sites and perform troubleshooting by using BSS Network Doctor reports
- Knowledgeable in both Nokia and Ericsson BTS types and configurations
- Knowledgeable in both Nokia and Ericsson MML command handling workarounds for configuration, performance, and fault management
- Perform optimization procedures for both Nokia and Ericsson to improve key performance indicators (KPIs)
 and fine tune BSS parameters

TECHNICAL PROFICIENCY

- Network performance monitoring, troubleshooting, and reporting Business Objects, Quantum, ERAN, COPS,
 Microsoft SQL, Schema Ultima Mentor, NetAct Applications (Reporting Suite/Network Doctor Reports)
- **Site Configuration Management** Common Explorer, Element Manager, AMOS, WinFIOL, ProComm, NetAct Applications (CM Operations Manager, BTS Manager, CM Editor)
- Data Management & Programming Microsoft Excel, Access, Visual Basic
- Design Simulation Tools Atoll, Aircom Asset, TEMS Cell planner Universal (TCPU), GeoPlan
- Mapping Solutions MapInfo, COPS, RMAP, MCOM, Actix Spotlight
- Tools & Equipments TEMS Investigation/ TEMS Pocket, R&S PR100 Portable Receiver, PCTEL Seegull LX/MX, Nemo, Summitek PIM Test Equipment

EDUCATION

B.S. in Electronics and Communications Engineering – April 2003 Southern Luzon State University, Quezon Province, Philippines *Graduated with Honors (Cum Laude)*

TECHNICAL TRAININGS/ WORKSHOPS ATTENDED

- GSM System Training (conducted by Globe Telecom)
- BSS Parameter Planning (conducted by Nokia)
- BSS Dimensioning Course (conducted by Nokia)
- Tems Cell Planner Universal (TCPU) Basic and Advanced Operation
- Field Test Engineering Tems Investigation, Agilent Anop, and Actix Analyzer
- Aircom Asset Planning Workshop
- Radio Network Planning and Optimization for Nokia and Ericsson Networks (conducted by Singapore Telecom)
- NSS Tools Summit (conducted by Verizon HQ)
- LTE RF Boot Camp (conducted by Award Solutions)

Juan F. Latorre III

122 Forest Hills Road Springfield, MA 01108 Cell: (413) 219-8305

E-Mail: juan.f.latorre@gmail.com

SUMMARY

Pursuing a position that will allow me to use my training in electrical and computer engineering in a goal-oriented environment. Strong problem solver that thrives on communication and teamwork. Growing foundation of project management skills. Committed to large-scale planning and small-scale detail.

WORK HISTORY

Verizon Wireless RF Engineer

East Hartford, CT January 2011 – Present

- Performed RF Planning for the roll out and optimization of over 150 macro cells within the Western Massachusetts foot print, providing CDMA, EVDO, and LTE services.
- Managed efforts of all partners (Real Estate, Zoning, Construction, System Performance) invested in a regional cell build plan that built new cells to meet growing LTE capacity needs.
- Established relationships with countless business partners in the fields of antenna design, system testing, and optimization solutions to forecast equipment ordering and identify new tools to utilize.
- Lead all efforts to clearly define sweeps package requirements for contractors, including coaxial and fiber solutions, to ensure construction work met internal standards for quality, system loss, and PIM.
- Provided capacity offload solutions for a growing LTE network through identification of macro cell optimization, LTE over AWS, in-building solutions, and event planning.
- Developed a regional internship program, designed to bring in college students for summer and winter internships, identify potential Full Time hires, and establish relationships with local colleges.

KMC Music, Inc.

Programmer/Analyst

Bloomfield, CT January 2008 – January 2011

- Developed and modified applications using Informix 4GL/SQL to support operations of musical instrument shipping and manufacturing company, grossing \$200 M in sales annually.
- Supported business initiatives for shipping and logistics at six major distribution centers in the U.S. and Canada.
- Created Electronic Data Interchange solutions to enhance communications, reducing order and invoicing times from hours to minutes.
- Elicited business requirements from customers and created technical requirements for software projects.
- Derived unit-test scenarios to verify and validate development work ahead of project deployments, leading to 95% modification success rate.
- Performed project management on development projects, including creation of project documents and support of project deployments.

EDUCATION

Western New England College Masters of Science, Engineering Springfield, MA June 2011

Concentration: Electrical Engineering, Engineering Management

University of Massachusetts Amherst

Amherst, MA

Bachelors of Science, Computer Systems Engineering

September 2007

Minor: Mathematics & Statistics

SKILLS

MapInfo, Delorme Suite, Alcatel-Lucent Planning Tool, Site Portal In-Building Optimization (ADRF, Commscope, Axell, Teko, Mobile Access) Microsoft: Project, Visio, Word, PowerPoint, Excel Presentation development and public speaking

HONORS

Boy Scouts of America (BSA) Eagle Scout

September 2003

INTERESTS

Registered volunteer Cubmaster (BSA); Athletics, camping, electric guitar, reading



Michael Libertine, LEP Director of Siting and Permitting All-Points Technology Corporation, P.C. 3 Saddlebrook Drive, Killingworth, CT 06419 860-663-1697 860-983-5153

General Background

Mr. Libertine has over 21 years of professional experience in the environmental consulting field. His experience includes regulatory compliance and permitting involving extensive interactions with the local, state and federal agencies, including the Connecticut Department of Energy and Environmental Protection, Connecticut Department of Transportation, and the Connecticut Siting Council, as well as the U.S. EPA and Federal Highway Administration; environmental assessments/impact statements for NEPA compliance; site assessments and field investigations for property transfers; remedial strategy development; environmental due diligence; Brownfields redevelopment projects; and remedial investigations at RCRA facilities as well as state and federally recognized hazardous waste site. Mike is a Licensed Environmental Professional in Connecticut and has been Project Manager on over 1700 environmental site assessments and field investigations for property transfers. Representative projects include:

Environmental Permitting Services for Wireless Telecommunications Clients, New England & NY Program Manager for environmental due diligence, siting and permitting services in support of various telecommunications clients throughout New England and New York. Mike has worked directly for licensed wireless service providers and tower management firms since 1997. Representative project-related services include due diligence and land use evaluations; preliminary site screenings; preparation of compliance documentation, environmental assessments and Memorandums of Agreement to fulfill NEPA requirements; Phase I ESAs and Phase II field investigations; remedial planning and oversight; wetland assessments; vegetative/biological surveys; noise analyses; visibility analyses; graphic support; preparation of regulatory permit applications, and construction support. Mr. Libertine has testified on behalf of telecommunications clients in front of local municipalities and the Connecticut Siting Council (CSC) on over 250 applications and petitions.

Environmental Siting and Permitting Services, Electrical Utilities

Program Manager from 2004 through 2010 in support of various Connecticut projects, including assessment and permitting of bulk power substations, transmission lines/structures, and underground utility installations. Services include civil engineering feasibility studies, pre-acquisition due diligence evaluations, natural resources inventories of existing flora and fauna, habitat evaluations, wetland delineations, noise analysis, hazardous waste investigations, site survey, layout and design drawings, landscape architecture, preparation of technical documents, coordination with State and local agencies, regulatory permitting, public outreach, and expert witness testimony.

Environmental Assessment and Constructability Review, Central Connecticut

Project Manager for natural resources inventory/assessment and construction evaluation along 35 miles of ROW corridor. Environmental tasks included Connecticut and federal wetland delineations, Army Corp of Engineers data plots, wetlands functions and values assessment, inventory of threatened and endangered species and critical habitats, biological surveys, and cover-type mapping. Once existing conditions were documented, a feasibility analysis was conducted to identify environmental and constructability conflicts associated with proposed new line installation and facility upgrades.

Certificates of Environmental Compatibility and Public Need, Electrical Substations, Connecticut
Project Manager in support of Applications to the CSC for the permitting of five new bulk power substations in
Killingly, Guilford, Windsor, Waterford and Westport, Connecticut. These projects required extensive coordination
of numerous team members, including client's in-house discipline managers and engineers, consultants, legal
counsel, staff, and subcontractors. Mike was responsible for overseeing pre-acquisition environmental due diligence
services, site survey, site data collection and analysis, site/civil layout, and drafting of municipal documents and the
Application to the CSC. Services included conducting natural resources inventories of existing flora and fauna,

habitat evaluations, wetland delineation, noise analyses, hazardous waste investigations, site layout and design drawings, landscape architecture, preparation of technical documents, coordination with State and local agencies, and permitting. Mike was also responsible for the preparation of Development and Management Plans to the CSC and providing environmental monitoring for adherence to the CTDEP's General Permit for Construction Activities and environmental requirements set forth in the Client's contract documents and specifications.

Environmental Evaluations and Regulatory Permitting, Wind Farm, Colebrook, Connecticut
Project Manager for environmental considerations associated with the development of Connecticut's first
commercial wind farm in northwest Connecticut. Responsibilities included overseeing due diligence, natural
resource studies and environmental permitting activities. The 3.2 MW project involved extensive evaluations of
wetland and other natural resources, flora and fauna studies, sound studies, flicker analyses, visual evaluations and
expert testimony at the local and state level, including multiple CSC hearings. Mike assisted this client in preparing
the Development and Management Plan and pre-construction coordination efforts.

Regulatory Permitting, Barbour Hill Substation Modifications, South Windsor, Connecticut

Project Manager responsible for the preparation of a Petition to the CSC for a determination that no Certificate of Environmental Compatibility and Public Need was required for the proposed modifications to the Barbour Hill Substation in South Windsor, Connecticut. The project included the replacement and expansion of an existing facility and the modification of line interconnections. Responsibilities included conducting natural resource inventories, wetland delineation, noise study, soil and groundwater sampling, property survey, preparation of site/civil design drawings, supporting graphics, photo-simulations, and local and state permit documents. Mike also supported his Client during the contractor selection process and developed a site-wide soil and water management plan for implementation during construction activities.

Environmental Impact Evaluation for Great Path Academy, Manchester, CT

Project Manager of an Environmental Impact Evaluation for expansion of a middle-college magnet high school serving eight member communities and operating within existing infrastructure at Manchester Community College. The project included a new free-standing facility on the campus to house the school and expand parking to accommodate 500 additional vehicles, enabling enrollment to increase from 75 to 300 students. Services included preparation of the EIE in accordance with CEPA to evaluate the project's associated potential environmental, social and economic impacts. The comprehensive document, distributed for public review and comment, assessed multiple locations for parking and building facilities within the MCC campus for parameters including: hydrology, traffic, visual impact on the surrounding community, energy consumption, and impacts to wildlife and habitat, potential historic and archaeological resources, forested areas, and a State-designated Greenway bike path. The result of the process was securing a Finding of No Significant Impact.

Employment History

Vanasse Hangen Brustlin, Inc., 54 Tuttle Place, Middletown, Connecticut
Director, Environmental Services May 1997 to January 2012
Atlantic Environmental Services, Inc./GEI Consultants, Colchester, Connecticut
Project Manager/Team Leader, January 1991 to May 1997

Education

University of Connecticut, B.S. Natural Resources Management, December 1990 Stonehill College, B.A. Marketing, May 1981

Certifications/ Licenses Licensed Environmental Professional, State of Connecticut, LEP No. 345 OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) Training (29 CFR 1910.120)

Dean Gustafson Professional Soil Scientist Senior Wetland Scientist All-Points Technology Corporation, P.C. 3 Saddlebrook Drive, Killingworth, CT 06419 860-663-1697 860-836-6576

General Background

Mr. Gustafson has over 24 years of professional experience in the environmental consulting field. His experience includes NEPA/CEPA documentation, wetlands (delineation, evaluation, mitigation design, monitoring, stream restoration, and local, state and federal permitting), water-quality investigations, coastal-zone-management studies, natural-resource and ecological evaluations. Mr. Gustafson is experienced in vernal pool monitoring and assessment, including identification of a wide variety of native amphibians and reptiles that utilize vernal pool habitats. Mr. Gustafson also has extensive experience with the Connecticut Department of Energy and Environmental Protection Natural Diversity Data Base and has resolved numerous potential rare species conflicts with proposed developments. Mr. Gustafson has particular expertise in wetland identification, soil mapping, soil classification, vegetative and hydrology surveys, wetland impact assessment, wetland mitigation design and oversight. In addition, he has extensive experience in local, state, and federal wetland permitting including having worked on over 100 Connecticut Siting Council dockets along with providing expert testimony at Council hearings. Mr. Gustafson has consulted on numerous projects which involve soils related issues such as erosion and sediment control planning, vegetative soil stabilization and storm water management BMP evaluation and selection. He has served as the Environmental Compliance Monitor on several Connecticut Siting Council approved projects. Mr. Gustafson's water quality experience includes stormwater studies for compliance with National Pollution Discharge Elimination System (NPDES), Section 401 Water Quality Certification, and the 2004 Connecticut DEP Stormwater Quality Manual.

Employment History

Vanasse Hangen Brustlin, Inc., 54 Tuttle Place, Middletown, Connecticut

- Natural Resource Group Leader 1997 to 2012
- Atlantic Environmental Services, Inc./GEI Consultants, Colchester, Connecticut
 - Senior Project Scientist 1992 to 1997

Soil Science & Environmental Services, Cheshire, Connecticut

Professional Soil Scientist 1988 to 1992

Key Projects

On Call Environmental Services, Northeast Utilitles Transmission Group

Task Manager in support of various Connecticut projects, including assessment and permitting of bulk power substations, transmission lines/structures, underground utility installations, and environmental investigations of existing facilities. Services include pre-acquisition due diligence activities, conducting site development feasibility assessments, natural resources inventories of existing flora and fauna, vernal pool studies and assessment, habitat evaluations, wetland delineations, wetland assessment, wetland mitigation design, wetland mitigation construction monitoring, permit compliance monitoring, site layout and design evaluations, erosion and sediment control planning and construction monitoring, vegetative soil stabilization and storm water management BMP evaluation and selection, preparation of technical documents, coordination with State and local agencies, and permitting support.

Environmental Compliance Monitor, Structure Replacement Project, Montague/Leverett, Massachusetts
Environmental Compliance Monitor in accordance with Massachusetts Department of Environmental Protection 401
Water Quality Certificate permit conditions for 345 kV structure replacement project. Monitoring included
installation of wooden timber swamp mats across a 65-acre beaver impoundment for the removal of eight existing
wooden structures and replacement with four steel structures. Environmentally sensitive compliance monitoring
across this approximate 3,500 linear foot span included monitoring of drilling activities for deep caisson foundations
within wetlands including in the middle of the beaver impoundment.

Regulatory Permitting, Barbour Hill Substation Modifications, South Windsor, Connecticut
Project Manager responsible for the preparation of a Petition to the Connecticut Siting Council for a determination

Project Manager responsible for the preparation of a Petition to the Connecticut Siting Council for a determination that no Certificate of Environmental Compatibility and Public Need was required for the proposed modifications to the Barbour Hill Substation in South Windsor, Connecticut. The project included the replacement and expansion of an existing facility and the modification of line interconnections. Responsibilities included conducting natural resource inventories, wetland delineation, noise study, soil and groundwater sampling, property survey, preparation of site/civil design drawings, supporting graphics, photo-simulations, and local and state permit documents. Mr. Libertine also supported CL&P during its contractor selection process and developed a site-wide soil and water management plan for implementation during construction activities.

Certificate of Environmental Compatibility and Public Need, Rood Avenue, Windsor, CT

Task Manager responsible for the preparation of environmental sections of a Certificate of Environmental Compatibility and Public Need to the Connecticut Siting Council for the construction of a new substation. The project included the construction of a substation in wooded uplands with direct wetland impacts. Responsibilities included conducting natural resource inventories, wetland delineation, and local and state permit documents and coordination with the U.S. Army Corps of Engineers New England Division. The project also included the successful transplanting of pink lady-slippers (*Cypripedium acaule*).

Regulatory Permitting, Barbour Hill Substation Modifications, South Windsor, CT

Task Manager responsible for the preparation of a Petition to the Connecticut Siting Council for a determination that no Certificate of Environmental Compatibility and Public Need was required for the proposed modifications to the Barbour Hill Substation. The project included the replacement and expansion of an existing facility and the modification of line interconnections. Responsibilities included conducting natural resource inventories, wetland delineation, and local and state permit documents.

Environmental Assessment and Constructability Review, Central Connecticut Reliability Project
Project Scientist for natural resources inventory/assessment and construction evaluation along 35 miles of ROW corridor. Environmental tasks included Connecticut and federal wetland delineations, Army Corp of Engineers data plots, wetlands functions and values assessment, inventory of threatened and endangered species and critical habitats, biological surveys, and cover-type mapping. Once existing conditions were documented, a feasibility analysis was conducted to identify environmental and constructability conflicts associated with proposed new line installation and facility upgrades.

Certificates of Environmental Compatibility and Public Need, Various Sites, Connecticut

Has served as Task Manager in support of numerous Applications to the Connecticut Siting Council (CSC) for the permitting of new electrical substations throughout Connecticut. These projects require extensive site data collection and analysis including natural resources inventories of existing flora and fauna, habitat evaluations, wetland delineation and function/value analysis, site layout analysis and wetland impact evaluation, wetland mitigation, preparation of technical documents, coordination with State and local agencies, and permitting. Environmental monitoring services for adherence to the CTDEP's General Permit for Construction Activities were also provided.

Environmental Permitting Services for Wireless Telecommunications Clients, New England & NY

Task Manager for environmental due diligence and permitting services in support of various telecommunications clients throughout New England and New York. Mr. Gustafson has worked directly with the major licensed PCS carriers since 1997. Projects include due diligence and land use evaluations; preliminary site screenings; preparation of compliance documentation, environmental assessments and Memorandums of Agreement to fulfill NEPA requirements; wetland delineation, assessments, and mitigation; local, state and federal wetland permitting; vegetative/biological surveys; rare species investigations; floodplain compliance; preparation of regulatory applications (including SEQRA submissions); permit compliance monitoring; and permitting support. Mr. Gustafson has testified on behalf of telecommunications clients in front of local municipalities and the Connecticut Siting Council on over 100 applications and petitions.

Telecommunications Carrier Wetland Compliance Program

Project Manager for major telecommunications carrier's wetland compliance program. Responsible for wetland delineation, assessment, mitigation and alternatives analysis, habitat evaluations, vernal pool identification and assessment, design review for permit feasibility, and successful permitting of over 50 wireless telecommunications facilities with local wetland/conservation commissions in the Connecticut, Massachusetts, and Rhode Island market

areas. Responsible for erosion and sediment control planning and construction monitoring for projects in Connecticut and Massachusetts that represent a potential to impact sensitive wetland resources during construction.

National Retailer, Rocky Hill, CT

Responsible for wetland permitting of a multi-tenant retail development resulting in significant unavoidable wetland impacts and the creation of a wetland mitigation area exceeding 1 acre is size. Wetland permits were secured from the Rocky Hill Wetland Agency, CTDEP and U.S. Army Corps of Engineers for wetland impacts and wetland mitigation area.

Luxury Residential Development, Hartford, CT

Project manager for an award-winning luxury residential community developer. Provided project management and technical direction for wetland compliance of projects undertaken in Connecticut including wetland determination, evaluation, mitigation design and local, state and Army Corps of Engineers permitting. Assisted with planning restoration of a failed slope that occurred during construction, secured approval from the local wetland commission and monitored erosion and sediment controls to ensure that nearby wetlands and perennial stream were not adversely impacted.

Retail Wetland Program, Various Projects, CT

Project manager for the Connecticut office for large retail Client Fee-for-Service and Turnkey Developer Programs. Provide project management and technical direction for wetland compliance of projects undertaken in Connecticut including wetland determination, evaluation, mitigation design and local, state and Army Corps of Engineers permitting.

Connecticut DOT West Haven/Orange Railroad Station, Environmental Assessment

Task manager for assessing natural resources, including wetlands, floodplain, aquatic habitats, and wildlife, associated with a proposed railroad station at one of two possible sites. Prepared technical documents in support of Draft Federal Environmental Assessment/Draft State Environmental Impact Evaluation.

Wetlands Survey and Permitting, ConnDOT Maintenance Facility.

Performed both a state and federal wetland survey and delineation in conjunction with the submission and successful obtainment of a CTDEP Inland Wetlands and Watercourses permit and 401 Water Quality Certifications to conduct remedial activities within and adjacent to existing floodplain wetlands.

Education

B.S. University of Massachusetts, Plant and Soil Sciences, 1988

Graduate coursework, University of New Hampshire

Affillations

Member, Lebanon Inland Wetlands and Watercourses

Commission, since 1995.

Member, Connecticut Audubon Society

Registration

Professional Soll Scientist, Society of Soil Scientists of Southern

New England, since 1988.

Connecticut Association of Wetland Scientists.

Association of Massachusetts Wetland Scientists.

Certifications

OSHA Hazardous Water Operations and Emergency Response

(HAZWOPER) Training (29 CFR 1910.120)

Eric R. Davison, CSS, CPWS

10 Maple Street, Chester, CT 06412 860-803-0938 ericrdavison@gmail.com

EDUCATION

2000 University of Massachusetts
New England Regional Soil Science Certificate Program

1998 University of Massachusetts
Bachelor of Science, Wildlife Conservation & Management

Amherst, MA

WORK EXPERIENCE

1998-present

Private Environmental Consultant, Chester, CT Wildlife Biologist, Wetland Scientist and Soil Scientist

Provided the following consulting services to clients:

- Herpetological surveys
- Vernal pool inventory and impact assessment
- Breeding bird surveys
- Wetland delineation and soil mapping
- Local, state and federal wetland permitting assistance
- Wetland impact assessments
- Wetland restoration and mitigation plans
- Land management planning
- Wetland functions and values assessments
- GIS based environmental assessments

2009-2011

Metropolitan Conservation Alliance Cary Institute of Ecosystem Studies, Millbrook, NY Biodiversity Specialist (three-year grant funded position)

- Conduct biodiversity studies throughout Connecticut and New York
- Inventory amphibian and reptile species using field techniques including cover searching, minnow trapping, pitfall trapping and hoop-net trapping
- Characterize and map upland and wetland habitats, soils, geology and other natural resource features
- Catalogue breeding bird species via visual identification and song
- Collect field data using GPS equipment and compile data collected using GIS software (*ArcMap 10.0*); create GIS maps and files of all field data collected

2000-2002

Northwest Park and Nature Center, Windsor, CT

Naturalist -Land Manager

- Responsible for habitat management and wildlife monitoring at 473-acre municipal park, with a focus on early-successional habitat management and monitoring of rare and state-listed grassland and shrubland wildlife
- Conducted public programs and special events
- Conducted conservation-related public outreach
- Staff liaison for the Town of Windsor Conservation Commission

1998-2000 Connecticut Department of Environmental Protection, Stafford, CT Park Maintainer

- Maintained all state park and forest areas within Shenipsit State Forest Unit
- Responsible for all facility and grounds maintenance
- Regular equipment operation included chainsaws, tractor with backhoe, loader, dumptruck, snowplow, skid-steer, mowers & woodworking

1995 Smithsonian Institution, Quantico Marine Base, Quantico, VA Field Technician

- Mist netting and banding of neotropical migrant songbirds
- Radio telemetry of the Wood Thrush (*Hylocichla mustelina*)
- Vegetation surveys around wood thrush nesting sites

Certifications & Computer Skills

- Certified Soil Scientist (Society of Soil Scientists of Southern New England)
- Certified Professional Wetland Scientist (Society of Wetland Scientists)
- Proficient in GIS (ESRI ArcMap 10.0), Microsoft Word, Excel & Access

Relevant Publications & Projects

- Author, Audubon Important Bird Area Conservation Plan, Greenwich Point Park, Greenwich in progress
- Author and field biologist, conservation easement documentation plans (four parcels), Granby Land Trust, 2013
- Co-author, Town of Ridgefield Natural Resource Inventory, 2012
- Author and field biologist, open space management plans (six parcels), Northern Connecticut Land Trust,
 2012
- Author, Audubon Important Bird Area Conservation Plan, Bent of the River Sanctuary, Southbury, CT, 2011
- Field biologist, point-count breeding bird surveys for CT Audubon, 2010 2011
- Author and field biologist, Lighthouse Point Meadow Restoration Plan, Lighthouse Point Park, New Haven, CT, 2011
- Field biologist and co-author, Haines Pond Management Plan, Brewster, NY, 2010
- Field biologist and co-author, Eastern Westchester Biotic Corridor: Northern Terminus Addendum, North Salem and Southeast, NY, 2010
- Field biologist and co-author, Haines Pond Biodiversity Study, Brewster, NY, 2009
- Field biologist and co-author, Eastern Westchester Biotic Corridor: Titicus Reservoir, North Salem, NY, 2009
- Author, Audubon Important Bird Area Conservation Plan, Northwest Park, Windsor, CT, 2007
- Field biologist and co-author, Town of Windsor Natural Resource Inventory, 2005

Professional Affiliations

- Commissioner, Inland Wetlands and Watercourses Commission, Town of Chester, CT
- Board Member, Connecticut River Coastal Conservation District
- Member, Society of Soil Scientists of Southern New England



Carlo F. Centore, P.E.

Principal – Structural

P: 203,488,0580 x:122 • F: 203,488,8587 • W: www.centekeng.com • e: cfcentore@centekeng.com

Photovoltaic system for Home Depot utilizing a

combination of thin film technologies and ground mounted silicon panels. Civil/Structural scope included

design of supports for inverters, solar panels, weather

Centered on Solutions

PROFILE

Mr. Centore has over 30 years of experience in engineering and construction. He has been responsible for the planning, design, construction, and project management on a broad set of publicly and privately developed projects. He has gained considerable insight into the requirements of project planning, practical engineering solutions, and fast-track projects. Significant projects have included schools, public housing projects building restoration, high-rise construction and most recently the planning and design of over 3,000 wireless telecommunications facilities.

REPRESENTATIVE PROJECTS

Major Construction Projects; 100 Pearl Street, a 17-story office building and parking garage (\$6.0 million); and Goodwin Square, a 32-story office building, hotel and parking garage (\$10.5 million); both located in Hartford, CT.

Additional Construction Projects; Banks - \$1.5 million, Hospitals - \$1.0 million, Commercial Office Buildings - \$1.3 million and Misc. Projects - \$1.0 million.

Additional Engineering Projects; Projects included the design of public housing projects, commercial and institutional facilities, including parking structures, office buildings, nursing homes, and federal prison housing; prepared property evaluations including budget estimates for building owners and property managers: and the supervision of numerous mechanical and electrical renovation projects.

Memorial Sloan Kettering Cancer Center – New York, NY

Structural analysis of wind and seismic loads for rooftop mechanical equipment.

Greenwich Hospital - Helmsley Pavilion Greenwich, CT

Data Center expansion to accommodate redundant Tel/Data equipment including structural mezzanine design, and supports for supplemental HVAC.

Zeego Hybrid Operating Room – New Haven, CT Design of a State of Art Hybrid Operating room with a Robotic C-Arm and Operating Table in an occupied operating suite. Scope included structural support for all radiology equipment, medical booms and operating lights.

Toshiba - Home Depot CDP Photovoltaic System - St. Croix USVI

Partnered with Toshiba Energy to develop a 360 KW

EDUCATION

stations and a utility support bridge.

B.S., Civil Engineering, University of New Haven, West Haven, Connecticut

REGISTRATIONS AND MEMBERSHIPS

- Professional Engineer; Connecticut, New York, Massachusetts Rhode Island, and Vermont, Pennsylvania, Virginia.
- National Council of Examiners for Engineering & Surveying (NCEES)
- National Society of Professional Engineers (NSPE)
- American Institute of Steel Construction (AISC)
- American Concrete Institute (ACI)

WORK EXPERIENCE

Centek Engineering, Inc. – Senior Project Manager, Structural (Since 1997); Structural Engineer/Project Manager providing consulting services for public housing projects; commercial, manufacturing and institutional facilities; and the design of wireless telecommunications facilities. Responsible for the solution of engineering problems. Determining of program objectives and requirements, organizing programs and projects, and developing standards and guides, team building, quality assurance and control for diverse engineering activities. Guidance is provided to the staff as related to overall objectives, critical issues, design concepts and policy matters.

The Deluca Construction Company; Project Manager (3 years)

Fisher & Salamone, P.C.; Structural Engineer/Project Manager (3 years)

Girard & Company Engineers; Structural Engineer (4 years)

The Fusco Corporation; Project Manager (3 years)



Harry M. Rocheville Jr., EIT

Civil Engineer

P: 203.488.0580 x:143 • F: 203.488.8587 • W: www.centekeng.com • e: hrocheville@centekeng.com

Centered on Solutions**

PROFILE

Mr. Rocheville is certified as an Engineer in Training (E.I.T.) and is aspiring to achieve Professional Engineering (P.E.) status after completion of the required experience and testing requirements. He has over 3 years of experience in Civil Engineering environments. Eager to learn and apply new skills in order to expand diversity of work. Able to adapt quickly to new challenges and problem solve. Able to work collaboratively or independently depending upon organizational needs.

REPRESENTATIVE PROJECTS

Palmer Pond, Voluntown, CT:

Verizon Wireless Communications Facility. Four-carrier rawland facility.

Glastonbury Montano Road, Glastonbury, CT:

AT&T Wireless Communications Facility. Co-location on an existing 120-ft tall monopole tower.

Stockbridge 4, Stockbridge, CT:

Verizon Wireless Communications Facility. Facility located in abandoned compound.

Stratford West, Stratford, CT:

Verizon Wireless Communications Facility. Co-location on an existing 99-ft tall monopole tower.

Waterbury North, Waterbury, CT:

AT&T Wireless Communications Facility. Rawland facility locating on existing NU transmission tower.

OVEC/Danielson 2, Killingly, CT:

Quinebaug Valley Emergency Cummincations and Verizon Wireless Communications Facility. Facility expansion and additional tower installation. QVEC equipment relocated to new tower and Verizon colocated on existing tower.

Silver Hill, New Canaan, CT:

Three carrier Phoenix Partnership rawland facility with 120-ft tall unipole tower.

EDUCATION

B.S., Civil Engineering, University of New Haven, West Haven, CT

WORK EXPERIENCE

Centek Engineering, Inc. – Civil Engineer; (2 years) Civil engineer for various, wireless communication applications, including rawland, colocation, communication tower and transmission tower facilities. Responsible for the design of equipment compounds, analysis of existing and proposed drainage systems, and implementation of erosion and sedimentation controls. Also, responsible for managing multiple projects and corresponding with appropriate parties.

The City of New Haven Engineering Department - Internship;

(1 year) Responsible for assisting Professional Engineers on multiple city projects in different facets of Civil Engineering.

ATTACHMENT 2

Baldwin, Kenneth

From:

Baldwin, Kenneth

Sent:

Tuesday, March 04, 2014 8:57 AM

To:

jzeoli@orange-ct.gov; Paul Dinice (pdinice@orange-ct.gov); treekote@aol.com;

mitchgoldblatt@aol.com

Cc:

Carter, Alexandria M; Ulanday, Ryan (Ryan. Ulanday@VerizonWireless.com); Brauer,

Mark; dtalmadge@structureconsulting.net; Baldwin, Kenneth

Subject:

Verizon Wireless - 831 Derby Milford Road

Gentlemen:

As requested at the February 18, 2014 public information meeting, Verizon Wireless' Radio Frequency ("RF") Engineers investigated the northerly portion of the Town-owned Turkey Hill Preserve parcel; that portion of the parcel along Derby Milford Road, near the intersection of Turkey Hill Road and Derby Milford Road, as a possible alternative to the proposed tower site at 831 Derby Milford Road. This location is about one mile south of the 831 Derby Milford Road site; two miles south of Verizon's existing Derby North cell site at 71 Pleasant View Road in Derby and only about ½ mile west of Verizon's existing Orange 3 cell site at 700 Grassy Hill Road in Orange. (Ref. Coverage Plots contained in the January 31, 2014 Technical Report filed with the Town of Orange)

By pulling the proposed cell site location this far to the south, several technical problems occur. First, this new tower location would be too close to Verizon's existing Orange 3 cell site (1/2 mile) and will cause significant interference problems in the area. Second, by pulling the proposed cell site one mile to the south, the site becomes less capable of providing capacity relief to those existing sites to the north and northwest. The proposed cell site at 831 Derby Milford Road is more centrally located between Verizon's existing cell sites and is therefore a more desirable location from a network design perspective. Third, in order for a tower on the Town parcel to provide coverage and capacity relief to the north and northwest, comparable to that provided by the proposed 831 Derby Milford Road site, the tower would have to be at least 180 feet tall, 80 feet taller than the tower currently proposed.

In addition to the network design benefits, the 831 Derby Milford Road location is more remote, allows for the use of a shorter tower, can take advantage of screening from existing trees on the Bespuda property, and, as Mr. Zeoli stated at the Public Information Meeting, would be less visible, overall, from residences in the area around the alternative tower sites.

For all of these reasons, Verizon does not believe that the Town parcel presents us with a viable alternative to the proposed tower site at 831 Derby Milford Road.

If the Town would like Verizon to consider any additional site locations please forward the information to me as soon as possible. We appreciate your assistance and cooperation.

Ken Baldwin

Kenneth C. Baldwin

Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103 Direct 860-275-8345 | Fax 860-275-8299 kbaldwin@rc.com | www.rc.com

Bio | Contact Card

Boston Providence Hartford New London Stamfold New York Albany Los Angeles Sarasota

Please consider the environment before printing this email

Baldwin, Kenneth

From:

Mitch Goldblatt <mitchgoldblatt@aol.com>

Sent:

Tuesday, March 04, 2014 5:52 PM

To:

Baldwin, Kenneth

Subject:

RE: Verizon Wireless - 831 Derby Milford Road

Ken,

Thank you for the detailed report. While quite disappointed, I understand your reasoning. I am still opposed to a tower on private property, but at this time I have no other suggestion.

Mitch

Mitchell R. Goldblatt 291 Drummond Road Orange, CT 06477 203-795-4337-Home 203-535-8505-Cell

From: Baldwin, Kenneth [mailto:KBALDWIN@RC.com]

Sent: Tuesday, March 04, 2014 8:57 AM

To: jzeoli@orange-ct.gov; Paul Dinice (pdinice@orange-ct.gov); treekote@aol.com; mitchgoldblatt@aol.com

Cc: Carter, Alexandria M; Ulanday, Ryan (Ryan. Ulanday@VerizonWireless.com); Brauer, Mark;

<u>dtalmadge@structureconsulting.net</u>; Baldwin, Kenneth **Subject:** Verizon Wireless - 831 Derby Milford Road

Gentlemen:

As requested at the February 18, 2014 public information meeting, Verizon Wireless' Radio Frequency ("RF") Engineers investigated the northerly portion of the Town-owned Turkey Hill Preserve parcel; that portion of the parcel along Derby Milford Road, near the intersection of Turkey Hill Road and Derby Milford Road, as a possible alternative to the proposed tower site at 831 Derby Milford Road. This location is about one mile south of the 831 Derby Milford Road site; two miles south of Verizon's existing Derby North cell site at 71 Pleasant View Road in Derby and only about ½ mile west of Verizon's existing Orange 3 cell site at 700 Grassy Hill Road in Orange. (Ref. Coverage Plots contained in the January 31, 2014 Technical Report filed with the Town of Orange)

By pulling the proposed cell site location this far to the south, several technical problems occur. First, this new tower location would be too close to Verizon's existing Orange 3 cell site (1/2 mile) and will cause significant interference problems in the area. Second, by pulling the proposed cell site one mile to the south, the site becomes less capable of providing capacity relief to those existing sites to the north and northwest. The proposed cell site at 831 Derby Milford Road is more centrally located between Verizon's existing cell sites and is therefore a more desirable location from a network design perspective. Third, in order for a tower on the Town parcel to provide coverage and capacity relief to the north and northwest, comparable to that provided by the proposed 831 Derby Milford Road site, the tower would have to be at least 180 feet tall, 80 feet taller than the tower currently proposed.

In addition to the network design benefits, the 831 Derby Milford Road location is more remote, allows for the use of a shorter tower, can take advantage of screening from existing trees on the Bespuda property, and, as Mr. Zeoli stated at the Public Information Meeting, would be less visible, overall, from residences in the area around the alternative tower sites.

For all of these reasons, Verizon does not believe that the Town parcel presents us with a viable alternative to the proposed tower site at 831 Derby Milford Road.

If the Town would like Verizon to consider any additional site locations please forward the information to me as soon as possible. We appreciate your assistance and cooperation.

Ken Baldwin

Kenneth C. Baldwin

Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103
Direct 860-275-8345 | Fax 860-275-8299
kbaldwin@rc.com | www.rc.com
Bio | Contact Card



Please consider the environment before printing this email

This transmittal may be a confidential attorney-client communication or may otherwise be privileged or confidential. If it is not clear that you are the intended recipient, you are hereby notified that you have received this transmittal in error; any review, dissemination, distribution, or copying of this transmittal is strictly prohibited. If you suspect that you have received this communication in error, please notify us immediately by telephone at 1-860-275-8200, or e-mail at it@rc.com, and immediately delete this message and all its attachments.

Baldwin, Kenneth

From:

Baldwin, Kenneth

Sent:

Tuesday, March 04, 2014 2:36 PM

To:

Paul Dinice (pdinice@orange-ct.gov); Joe LoVerme (jloverme@gmail.com);

'jzeoli@orange-ct.gov'; 'treekote@aol.com'

Cc:

'Carter, Alexandria M'; Mayo, Rachel; dtalmadge@structureconsulting.net;

mlibertine@allpointstech.com

Subject:

RE: Proposed Verizon Wireless Facility - 831 Derby Milford Road

Due to an unforeseen schedule conflict, Mike Libertine at APT needs to shift the balloon float at 831 Derby Milford Road to Wednesday afternoon.

The balloon should be up at the site by noon tomorrow and will stay up through most of the afternoon. I apologize for the late notice of this change in the schedule.

Please contact me if you have any questions.

Ken Baldwin

From: Baldwin, Kenneth

Sent: Monday, March 03, 2014 10:23 AM

To: Paul Dinice (pdinice@orange-ct.gov); Joe LoVerme (jloverme@gmail.com); 'jzeoli@orange-ct.gov';

'treekote@aol.com'

Cc: Carter, Alexandria M; Mayo, Rachel; dtalmadqe@structureconsulting.net; Baldwin, Kenneth

Subject: Proposed Verizon Wireless Facility - 831 Derby Milford Road

Gentlemen:

Mike Libertine with All-Points Technologies called this morning and said that he and his team will be out at the 831 Derby Milford Road site this Wednesday morning (March 4, 2014) to float the balloon and conduct their field reconnaissance for the Visual Report they are preparing. They expect to be out there first thing in the morning and will probably have the balloon up from 9 a.m. to 1 p.m.

I'm hoping that Paul Denice can alert the Planning and Zoning Commission members. I found Mr. Clark's e-mail address on the Town's web site so I've copied him on this e-mail directly.

Also, Mr. LoVerme, Mike Libertine will be contacting you Wednesday about your request that he assess certain views from your property. Mike has your contact information.

If any of you want to reach out to Mike Libertine directly his mobile number is 860-983-5153.

Please feel free to contact me if you have any questions.

Kenneth C. Baldwin

Robinson & Cole LLP280 Trumbull Street
Hartford, CT 06103
Direct 860-275-8345 | Fax 860-275-8299

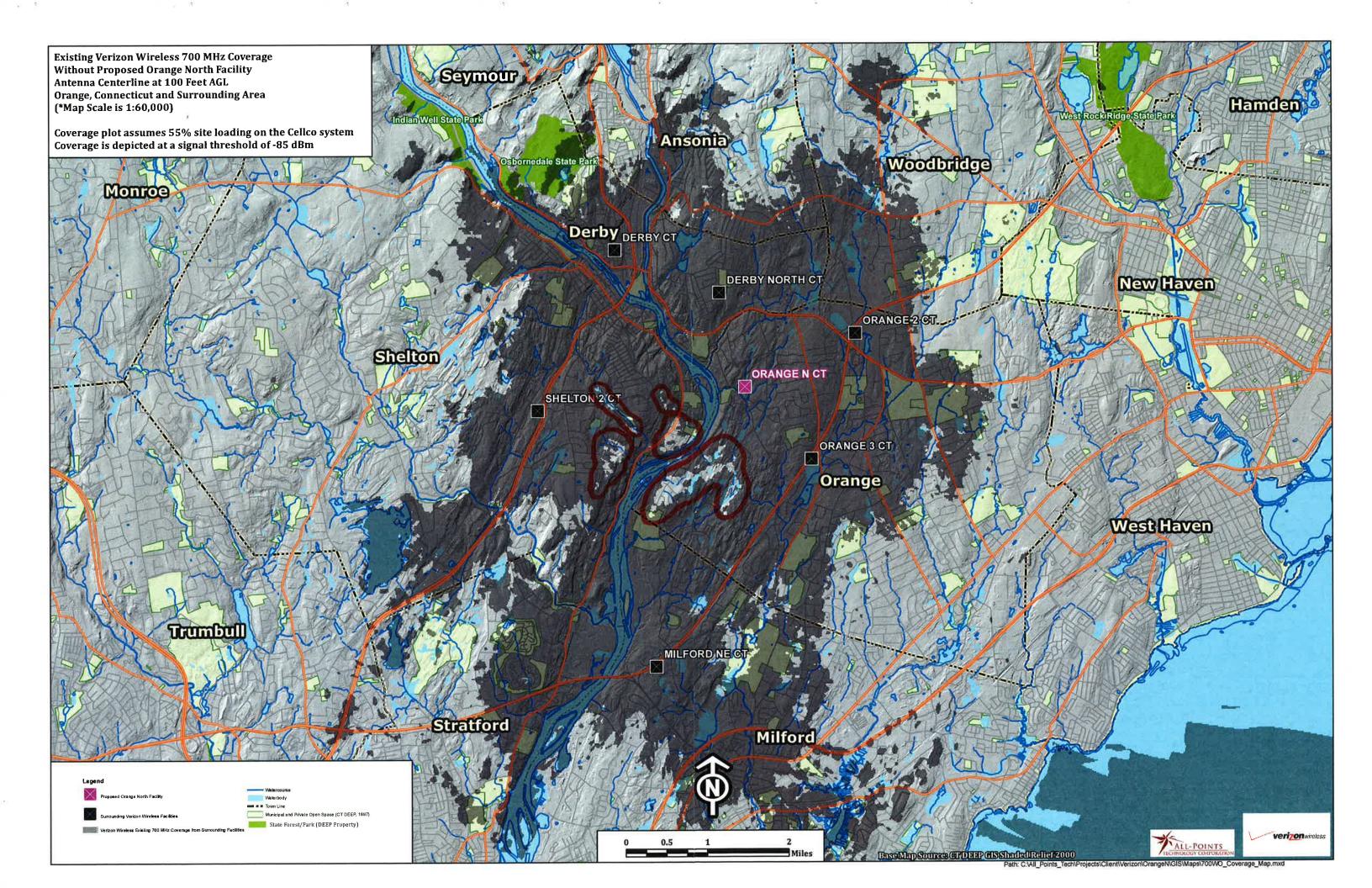
kbaldwin@rc.com | www.rc.com Bio | Contact Card

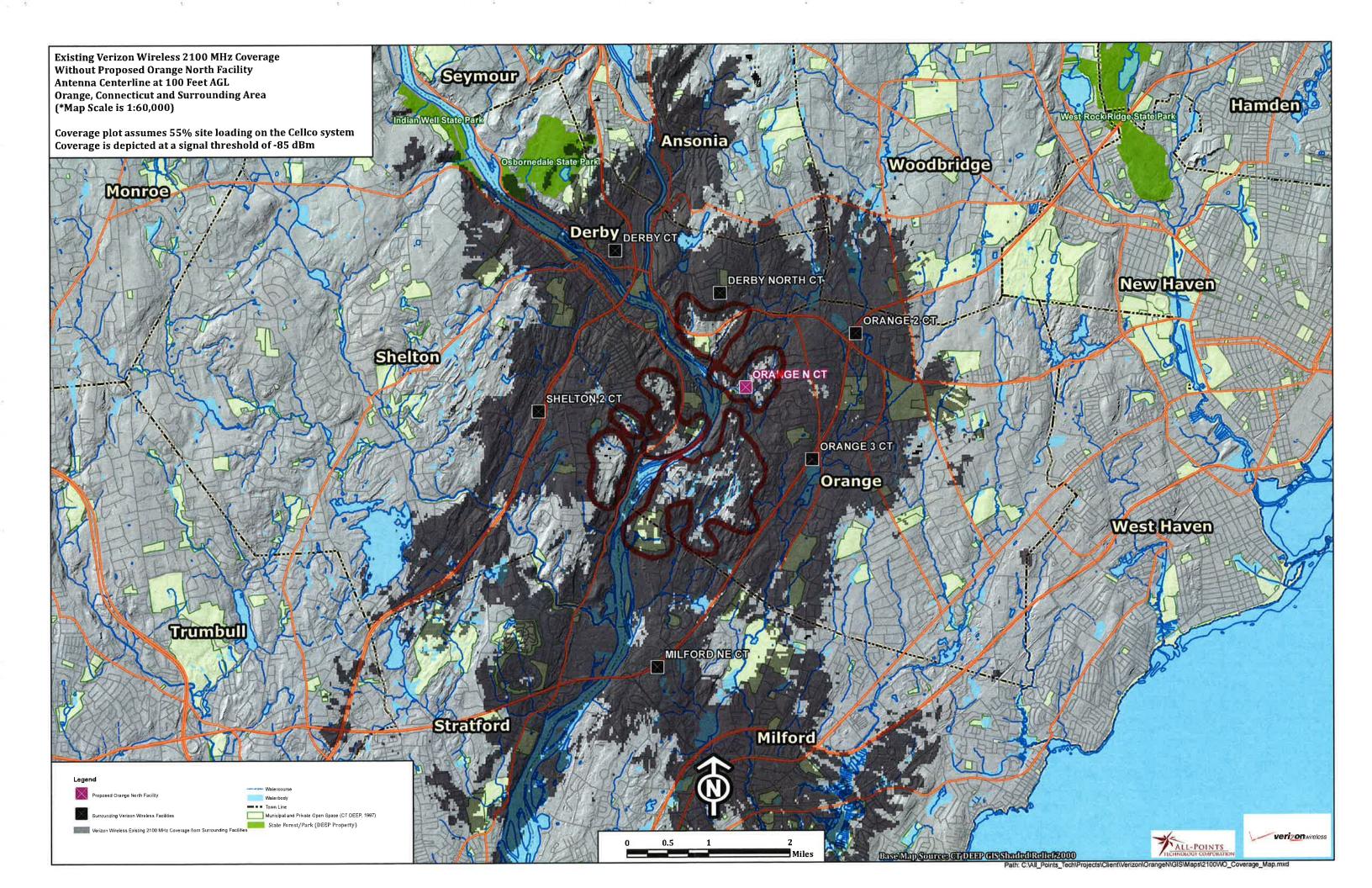
Roston Providence Harden New London Fraction New York Albany Los Angeles Savasota

RECYCLE IN U.S.E. RECYCLE

Please consider the environment before printing this email:

ATTACHMENT 3





ATTACHMENT 4

